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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**12 M 639**

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

KWABENA ADDO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

DANIEL REED, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about July 6, 2012, within the Eastern District of New York and elsewhere, defendant KWABENA ADDO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).



The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about July 6, 2012, KWABENA ADDO arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Delta Flight 27 from Accra, Ghana.

2. Defendant KWABENA ADDO was selected for a Customs and Border Protection ("CBP") examination. He presented one checked-in, black bag and one brown suitcase for inspection. During a routine inspection, an officer noticed a strong odor emanating from the black bag and emptied it; he then noticed that the sides and bottom were unusually thick. Subsequent inspection of the bag revealed a hidden, brown, powdery substance that field-tested positive for heroin. The defendant was placed under arrest.

3. The total approximate gross weight of the heroin found in defendant KWABENA ADDO's bag is 2,974.4 grams.

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.



WHEREFORE, your deponent respectfully requests that  
defendant KWABENA ADDO be dealt with according to law.



DANIEL REED

Special Agent

U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
6th day of July, 2012

  
HONORABLE  
UNITED STATES  
EASTERN DISTRICT OF NEW YORK

S. Bloom

JUDGE  
EASTERN DISTRICT OF NEW YORK